



ARKANSAS
Department of Environmental Quality

February 26, 2008

08-S-16979

Geomatrix
Attn: Kelly Beck
Project Manager
5725 Highway 290 West, Suite 200-B
Austin, Texas 78735-8722

RE: Response to Comments on the Facility Investigation Workplan for Cedar Chemical Company (January 18, 2008)
EPA ID Number ARD990660649; AFIN 54-00068

Dear Ms. Beck:


The Arkansas Department of Environmental Quality – Hazardous Waste Division (ADEQ) has reviewed the February 22, 2008 responses to the Cedar Chemical Company Facility Investigation Workplan (FIWP). Based on our review the FIWP is approved with the following conditions:

- In the February 4, 2008 Notice of Deficiency (NOD) letter, ADEQ indicated the focus of the FIWP should be to collect enough data at the drum vault, the former dinoseb ponds, and the process areas to determine the full extent of horizontal and vertical contamination at the site. In response to this comment, Geomatrix has indicated the focus of the soil investigation at the drum vault, former dinoseb ponds, and the process areas is to identify possible source areas that may need to be addressed as part of a site remedy, rather than to provide delineation of the vertical and horizontal extent of contamination for each constituent in the site soils. ADEQ acknowledges that if the data collected in these areas are adequate to select a remedy and ultimately provide source control this approach would be adequate. However, please note that at any point the proposed sampling approach does not allow an adequate source control or remedy selection to be made, additional sampling may be required to determine the full nature and extent of contamination.
- In the February 4, 2008 NOD, ADEQ expressed concern there was no mention of conducting any further investigation of the existing wastewater treatment ponds. In response, Geomatrix suggested the assessment of the sludge from these ponds would not be useful since the ponds will continue to be utilized. Please note, ADEQ considers the current use of the ponds to be an interim measure control only. When Geomatrix has completed the facility investigation and remedies are in place, the ponds will need to go through closure. At that point, a full assessment of the sludges will need to take place, followed by closure activities.

Geomatrix needs to submit change pages for the FIWP and an electronic copy of a fully revised FIWP no later than March 10, 2008. If you have any questions or need additional information,

please feel free to contact Tammie J. Hynum of my staff at (501) 682-0856 or hynum@adeq.state.ar.us or myself at (501) 682-0831 or at benefield@adeq.state.ar.us.

Sincerely,



J. Ryan Benefield, P.E.
Hazardous Waste Division Chief

cc: Mark Hemingway, P.G., Geomatrix
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